

1 UNITED STATES BANKRUPTCY COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 SAN FRANCISCO DIVISION

4 In re:

5 PG&E CORPORATION,

6 - and -

7 PACIFIC GAS AND ELECTRIC
8 COMPANY,

Debtors.

9
10 ☐ Affects PG&E Corporation

11 ☐ Affects Pacific Gas and Electric Company

12 ☒ Affects both Debtors

13 ** All papers shall be filed in the Lead Case,*
14 *No. 19-30088 (DM).*

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**FIRST AND FINAL MONTHLY FEE
STATEMENT OF DUNDON
ADVISERS LLC FOR ALLOWANCE
AND PAYMENT OF
COMPENSATION AND
REIMBURSEMENT OF EXPENSES
FOR THE PERIOD MARCH 1, 2019
THROUGH AUGUST 31, 2019**

[No hearing requested]

OBJECTION DEADLINE:
December 5, 2019 at 4:00 p.m. (PDT)

15
16 To: The Notice Parties

17 Name of Applicant:

Dundon Advisers LLC, Financial Advisor for
the Official Committee of Tort Claimants

18
19 Authorized to Provide Professional Services to:

Official Committee of Tort Claimants

20 Period for which compensation and
reimbursement are sought:

March 1, 2019 through August 31, 2019

21 Amount of compensation and reimbursement
are sought:

\$122,363.20 (80% of \$152,954.00)

22 Amount of expense reimbursement sought as
23 actual, reasonable, and necessary:

\$5,370.24

24
25 Dundon Advisers LLC (“**Dundon**” or the “**Applicant**”), financial advisor for the Official
26 Committee of Tort Claimants (the “**Tort Committee**”), representing the largest group of
27 stakeholders in the jointly administered bankruptcy cases (the “**Chapter 11 Cases**”) of PG&E
28

1 Corporation and Pacific Gas and Electric Company (the “**Debtors**”), hereby submits its first and
2 final combined monthly fee statement (the “**Monthly Fee Statement**”) for allowance and payment
3 of compensation for professional services rendered, and for reimbursement of actual and necessary
4 expenses incurred for the period commencing March 1, 2019 through and including August 31,
5 2019 (the “**Fee Period**”) pursuant to 11 U.S.C §§ 331 and 105(a), Fed. R. Bankr. P. 2016, and the
6 Procedures for Interim Compensation and Reimbursement of Expenses of Professionals entered
7 February 27, 2019 [Dkt. No. 701] (the “**Interim Compensation Procedures Order**”).

9
10 By this Monthly Fee Statement, Dundon requests allowance and payment of \$122,363.20
11 (representing 80% of \$152,954.00) as compensation for professional services rendered to the Tort
12 Committee during the Fee Period and allowance and payment of \$5,370.24 (representing 100% of
13 the expenses allowed) as reimbursement for actual and necessary expenses incurred by Dundon
14 during the Fee Period.*

15 Annexed hereto as **Exhibit A** is the name of each professional who performed services for
16 the Tort Committee in connection with these Chapter 11 Cases and for which Dundon is seeking
17 compensation during the Fee Period covered by this Monthly Fee Statement and the hourly rate
18 and total fees for each professional. Attached hereto as **Exhibit B** is a summary of hours spent
19 during the Fee Period by task. Attached hereto as **Exhibit C** is a summary of expenses incurred
20 during the Fee Period. Attached hereto as **Exhibit D** are the detailed time entries for the Fee Period.
21 Attached hereto as **Exhibit E** are the detailed expense entries for the Fee Period.

22 **PLEASE TAKE FURTHER NOTICE** that, in accordance with the Interim Compensation
23 Procedures Order, responses or objections to this Monthly Fee Statement, if any, must be filed and
24 served on or before the 21st day (or the next business day if such day is not a business day)
25 following the date the Monthly Fee Statement is served (the “**Objection Deadline**”) with this
26 Court.

27 * By agreement with the Tort Claims Committee, this Monthly Fee Statement does not reflect Dundon’s actual time in
28 non-working travel nor its actual time spent on retention and fee application matters, the former being limited to four
hours each way and to 50% of rates for such time; the latter being substantially reduced for periods preceding July 31,
2019 and omitted altogether for periods thereafter.

1 **PLEASE TAKE FURTHER NOTICE** that upon the expiration of the Objection Deadline,
2 Dundon shall file a certificate of no objection with the Court, after which the Debtors are authorized
3 and directed to pay Dundon an amount equal to 80% of the fees and 100% of the expenses requested
4 in this Monthly Fee Statement. If an objection is properly filed, the Debtors shall be authorized
5 and directed to pay Dundon 80% of the fees and 100% of the expenses not subject to an objection.

6 Dated: November 14, 2019

Respectfully submitted,

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8 DUNDON ADVISERS LLC

9 By: /s/ Matthew Dundon
10 Matthew J. Dundon, Principal

11 Financial Advisor for Official Committee of Tort
12 Claimants
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Notice Parties

PG&E Corporation c/o Pacific Gas & Electric Company Attn: Janet Loduca, Esq. 77 Beale Street San Francisco, CA 94105	Keller & Benvenuti LLP Attn: Tobias S. Keller, Esq. Jane Kim, Esq. 650 California Street, Suite 1900 San Francisco, CA 94108
The Office of the United States Trustee for Region 17 Attn: James L. Snyder, Esq. Timothy Laffredi, Esq. 450 Golden Gate Avenue, 5th Floor, Suite #05-0153 San Francisco, CA 94102	Milbank LLP Attn: Dennis F. Dunne, Esq. Sam A. Khalil, Esq. 55 Hudson Yards New York, NY 10001-2163
Milbank LLP Attn: Paul S. Aronzon, Esq. Gregory A. Bray, Esq. Thomas R. Kreller, Esq. 2029 Century Park East, 33rd Floor Los Angeles, CA 90067	Weil, Gotshal & Manges LLP Attn: Stephen Karotkin, Esq. Jessica Liou, Esq. Matthew Goren, Esq. 767 Fifth Avenue New York, NY 10153-0119
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